

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL GRAHAM; ALEXUS DIGGS; and
HEATHER CONNOLLY, *on behalf of
themselves and all others similarly situated,*

Plaintiffs-Petitioners,

v.

ALLEGHENY COUNTY; and ORLANDO
HARPER, *Warden of Allegheny County Jail,*

Defendants-Respondents.

Civil Action No. 2:20-cv-00496

ELECTRONICALLY FILED

IMMEDIATE RELIEF SOUGHT

JOINT MOTION FOR ENTRY OF CONSENT ORDER

The parties respectfully request that this Honorable Court enter the parties' Proposed Consent Order, attached as Exhibit 1, and as support therefor aver as follows:

1. Plaintiffs filed a motion for preliminary injunction on April 9, 2020, asking this Court to, *inter alia*, require that Defendants instituting policies and reasonable accommodations, consistent with the CDC's public health guidelines to protect people incarcerated at the Allegheny County Jail from COVID-19.
2. After numerous discussions, the parties have reached an agreement on the policies and reasonable accommodations that the Allegheny County Jail will follow to protect people from COVID-19.
3. Accordingly, the parties are jointly submitting a proposed consent order that, if approved by the Court, will resolve the plaintiffs' motion for preliminary injunction.

WHEREFORE, the parties respectfully request that this Court enter the Proposed Consent Order attached as Exhibit 1.

Respectfully submitted,

/s/ Sara J. Rose

Sara J. Rose, Esq.
PA ID No.: 204936

/s/ Witold J. Walczak

Witold J. Walczak, Esq.
PA ID No.: 62976

**American Civil Liberties Union of
Pennsylvania**

PO Box 23058
Pittsburgh, PA 15222
T: (412) 681-7864 (tel.)
F: (412) 681-8707
srose@aclupa.org
vwalczak@aclupa.org

/s/ Alexandra Morgan-Kurtz

Alexandra Morgan-Kurtz, Esq.
PA ID No. 312631

Pennsylvania Institutional Law Project

100 Fifth Ave, Ste. 900
Pittsburgh, Pa 15222
T: (412) 434-6175
amorgan-kurtz@pailp.org

/s/ Sozi Pedro Tulante

Sozi Pedro Tulante, Esq.
PA ID No. 202579

Dechert LLP

Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808
T: (215) 994-2496
F: (215) 665-2496

Sozi.tulante@dechert.com

Admitted pro hac vice

Attorneys for Petitioners/Plaintiffs

/s/ John A. Bacharach

John A. Bacharach, PA ID 19665
Allegheny County Assistant Solicitor
Allegheny County Law Department

/s/ Bret Grote

Bret D. Grote, Esq.
PA ID No. 317273

/s/ Quinn Cozzens

Quinn Cozzens, Esq.
PA ID No. 323353

/s/ Jaclyn Kurin

Jaclyn Kurin, Esq.
D.C. Bar ID No. 1600719

/s/ Jules Lobel

Jules Lobel, Esq.
Of Counsel
N.Y. Bar No. 1262732

/s/ Swain Uber

Swain Uber, Esq.
Of Counsel
PA I.D. No. 323477
Abolitionist Law Center

P.O. Box 8654
Pittsburgh, PA 15221
T: (412) 654-9070
bretgrote@abolitionistlawcenter.org
qcozzens@alcenter.org

300 Fort Pitt Commons Building
445 Fort Pitt Boulevard Pittsburgh, PA 15219
Tel: (412) 350-1150
john.bacharach@AlleghenyCounty.us

Counsel for Defendants